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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

J.C.O.C. on his behalf and on behalf of his
 minor child, M.M.O.S.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:23-cv-5268-SI

**JOINT NOTICE OF CONDITIONAL
 SETTLEMENT AND REQUEST TO STAY
 LITIGATION DEADLINES**

The parties, by and through undersigned counsel, hereby notify the Court that the parties have reached a conditional settlement in this action under the Federal Tort Claims Act, 28 U.S.C. § 2671, et seq. and stipulate and respectfully request that all current deadlines be vacated and the action be stayed, based on the following:

1. The parties have reached a conditional settlement of all claims in this litigation, subject to the approval of the settlement of the minor's claims by a court of competent jurisdiction, which may take some time, to be followed by the approval of the Attorney General of the United States or his designee.

2. Absent a stay pending finalization of the settlement, litigation burden and expense will be

1 incurred that are to be made unnecessary by the pending settlements.

2 3. The parties stipulate to file a joint status report every 60 days during the stay to keep the
3 Court apprised of the progress of the pending settlement. It is anticipated that, once the settlement is
4 completed, the parties will file a stipulation for dismissal of all claims.

5 Therefore, in the interest of judicial economy and efficiency, and to preserve the benefit of the
6 pending settlement, the parties stipulate and respectfully request that the Court enter an order vacating
7 all current deadlines and staying this action pending further stipulation or motion of the parties or Order
8 of the Court.

9 Respectfully submitted,

10 ISMAIL J. RAMSEY
11 United States Attorney

12 Dated: April 10, 2024

13 By: /s/ Michael A. Keough
MICHAEL A. KEOUGH
VALERIE E. SMITH

14 *Assistant United States Attorneys*
15 *Attorneys for Defendant*

16 s/ Yan-Xin Li*
17 YAN-XIN LI

18 *Attorney for Plaintiffs*

19 ** In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of*
20 *perjury that all signatories have concurred in the filing of this document.*

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED that because the parties have reached a conditional settlement of all claims in this litigation, subject to the Court's approval of the settlement of the minor's claims:

1. All present deadlines are hereby vacated.
2. This action is stayed pending further stipulation or motion of the parties or Order of the Court.
3. The parties shall file a joint status report within sixty (60) days of the entry of this Order, and every sixty (60) days thereafter, in which they shall keep the Court apprised of the progress of the pending settlement.

Dated:

UNITED STATES DISTRICT JUDGE